

## ALLEN & OVERY

### VIA ECF AND EMAIL

Honorable Richard J. Sullivan  
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January 20, 2016

**Re: Gucci America, Inc., et al. v. Weixing Li, et al.,  
No. 2010 Civ. 4974 (RJS) (S.D.N.Y.)**

Dear Judge Sullivan:

We write on behalf of non-party Bank of China (“BOC”) in reference to the Court’s Orders dated September 27, 2015, October 16, 2015, November 30, 2015, and January 13, 2016 (the “Orders”), compelling BOC’s compliance with subpoenas dated July 16, 2010 and February 23, 2011 that were served on BOC’s New York Branch by plaintiffs’ counsel (the “Subpoenas”).

BOC has delivered to plaintiffs’ counsel all non-privileged documents responsive to the Subpoenas that it has been able to locate following a reasonable search. BOC will supplement this production in the event that it locates additional documents responsive to the Subpoenas. We have advised plaintiffs’ counsel that we are available to meet and confer should they have any questions or concerns about BOC’s production.

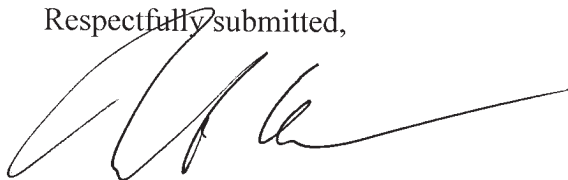
By making today’s document production, BOC has complied with the Court’s Orders and believes it has purged its contempt. Pursuant to the terms of the January 13, 2016 Order, BOC believes that no sanctions payment is due today nor should become due going forward.

Given the immediacy of this matter, we will, pursuant to Rule 1.B of the Court’s Individual Rules and Practices, contact the Court for further instructions.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Esseks', with a long horizontal flourish extending to the right.

**David C. Esseks**

Copy to: Counsel of record (via email)